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May 5, 1993

Ms. Rebecca Frey  
Remedial Response Branch (HSRL-6J)  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

Re: West Chicago Superfund Sites

Dear Ms. Frey:

I understand from the enclosed article in the West Chicago Press that Region 5 is considering the storage of tailings from certain of the West Chicago Superfund Sites at Manville Oaks Park. Although I recognize that the article may not accurately reflect the views of Region 5, I am writing on behalf of Kerr-McGee Chemical Corporation ("Kerr-McGee") to comment on it.

The article states that the park is viewed as a desirable storage location because the tailings could subsequently be loaded on railcars along the western edge of the park. A park spokeswoman is quoted as saying that the park offers logistical advantages because it "would only require one move."

As we understand the facts, Region 5 is seeking a site at which tailings could be stored until they are shipped for disposal elsewhere. Any such location will inevitably involve double handling: the placement of the material at the storage site, followed by the retrieval of the material for placement on railcars. The claim that the Manville Oaks Park -- or any storage site -- offers advantages in terms of single handling of the waste does not accord with the purpose of a storage location.

We also believe that the article is misguided in suggesting that the propinquity of a rail line necessarily offers advantages. In order to load the tailings on railcars, it will probably be necessary to construct a rail siding and a loading facility that will provide adequate dust control.

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(Even if the tailings were stored in containers, a siding may be necessary.) Moreover, installation of any necessary access roads would lead to adverse impacts to the park. In light of the financial and other costs associated with such construction, it is not reasonable to duplicate the loading facilities that must be constructed in any event at the West Chicago Facility.

Perhaps the most serious disadvantage with the use of the Manville Oaks Park for storage is the prospect of contaminating a now clean area with tailings. Moreover, any storage site must be licensed by the IDNS, with attendant ongoing costs for monitoring, security, and decommissioning. Storage at any off-site location will thus serve to expand the present West Chicago problems and to increase expense.

In our view, the only sensible solution is the use of the West Chicago Facility for storage. Kerr-McGee has stated that it is prepared to attend a meeting that EPA might convene with IDNS to discuss the licensing issues associated with the use of the Facility for this purpose.

Please call if you would like to pursue any of the matters discussed in this letter. In the meantime, I would appreciate it if you would include this letter in the administrative record that Region 5 has established for the West Chicago Superfund Sites. Because the Comments of Kerr-McGee Chemical Corporation on the Focused Risk Assessment for West Chicago Vicinity Properties and the Associated Fact Sheet (Feb. 25, 1993) also discuss the conduct of the removal program, I would appreciate it if you would assure that these comments are also part of the administrative record.

Very truly yours,



Richard A. Meserve  
Counsel for Kerr-McGee  
Chemical Corporation

RAM:lmb

cc: Mark Radell, Esq.

# Manville Oaks considered for temporary thorium storage

## EPA option would aid residential cleanup

by Michael McCulloh

The West Chicago Park District is considering a federal plan that would make use of one of its parks as a temporary storage site for thorium waste.

Park District commissioners heard representatives from the Environmental Protection Agency last week asking them to consider using Manville Oaks Park, at Joliet and Wilson streets, to store thorium from unincorporated residential areas of West Chicago, Park District spokeswoman Jeanette McMahon said.

"The board is keeping an open mind on the subject, because storing the waste at the park would help to get the thorium out of people's yards," McMahon said. "We have nothing to gain except that we would be helping people."

Board President Maria Owens said the site at Manville Oaks and the city's wastewater treatment plant on Route 59 are the only two sites being considered. She added, though, that nothing more than discussions have occurred at this point.

"They just wanted to inform us of the possibility," Owens said, adding that the board would want their two new commis-

sioners, Nick Davidson and James Jones, to review the proposal before any decisions were made. Davidson and Jones will be sworn in at the May 18 Park District meeting.

The public also would have input on any decisions that would be considered on this topic, Owens said.

The site only would be used for interim purposes, because a proposed permanent storage site in Utah, Havisocase, is expected to be licensed this fall. The Residential Areas cleanup, however, is slated to begin in the summer, creating a need to temporarily store the thorium somewhere, McMahon said.

The advantages of storing the thorium at Manville Oaks, from a geological standpoint, are the site is on high ground and the rock strata is more stable, McMahon said. Also, the material would be easier to load from the park onto the railcars which run along the western edge of the park, McMahon said.

"Logistics-wise, it's a lot easier than moving the thorium from the (wastewater) treatment plant all the way to the railroads," McMahon said. "Manville (Oaks) would only require one move."

6 Section 2 Chicago Tribune, Tuesday, April 27, 1993

## Nuclear waste foe sees transportation hazards

If a Nevada mountain is used as the nation's burial site for spent nuclear-reactor fuel, up to 45 percent of the fuel would pass through the Chicago area on its way to the site, opponents of the Nevada dump proposal said Monday.

Some radioactive material could be released in the metropolitan area if the steel-and-lead containers holding the fuel were involved in an extremely severe accident or were subject to a terrorist attack, according to Bob Halstead of Nevada's Nuclear Waste Project Office, a state governmental agency.

Nevada has been fighting a plan by the U.S. Department of Energy to carve out a radioactive waste repository inside Yucca Mountain, about 70 miles northwest of Las Vegas.

Currently, spent nuclear fuel is stored at the nation's 110 nuclear power plants.

Chicago Tribune 4-27-93

West Chicago Press 4-29-93